

From: [Granger, Michelle](#)
To: [Zizila, Frances](#)
Subject: Fw: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call
Date: Monday, August 20, 2018 12:24:39 PM

Hi, Frances-

Bruce sent the message below with proposed agenda. Please let me know if you are planning to be in the office tomorrow. I can come down to your office for the call if that works for you. Kim is on vacation this week, but I did speak with her before she left. Can you talk at 11am or 11:30am tomorrow briefly before our 1:30pm call?

Best,
Michelle-

From: Bruce S Kennington <bkennington@ramboll.com>
Sent: Monday, August 20, 2018 9:53 AM
To: Granger, Michelle
Cc: Hidalgo, Luis (G&I)
Subject: RE: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Dear Michelle:

On behalf of Luis Hidalgo (Rio Tinto), Project Coordinator for OU3, we propose to have our call tomorrow on **Tue, Aug 21st at 1:30 Eastern** (12:30 PM Central / 11:30 PM Mountain) Time. I will send out a calendar appointment reminder with WebEx dial-in information to you next with copy to Kim O'Connell, Frances Zizila, and the USACE representatives. To guide our discussion on this call a proposed agenda is below.

- I. Locations of USEPA proposed additional soil borings (north of PDI-SB25 and south of PDI-SB26).
- II. PPPI/Rio Tinto efforts to secure an earlier date for additional PDI soil borings during Albéa plant operation.
- III. Review of proposed soil boring locations for installation during the scheduled Albéa plant shutdown (Dec 24 to Jan 1).
- IV. Path Forward: Project Time Schedule and preparation of Remedial Design Submittals.
- V. Q&A / Action Items

We will be prepared to put site figures and images on the screen to display during our call, so please ask folks to connect via the internet for the visual portion of the presentation.

Sincerely,
Bruce S Kennington
Principal

D +1 (312) 288-3834
M +1 (312) 953-9965
bkennington@ramboll.com

From: Granger, Michelle [mailto:Granger.Michelle@epa.gov]

Sent: Thursday, August 16, 2018 12:53 PM

To: Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com>

Cc: Bruce S Kennington <bkennington@ramboll.com>

Subject: Re: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Hi, Luis-

Can we set a call up for Tuesday, 8/21 at 1pm or 1:30pm? Please send invite to usual folks and please add Frances Zizila (Zizila.Frances@epa.gov). Kim is not available next week, but please send her the invite as well.

Thank you!

Michelle-

From: Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com>

Sent: Wednesday, August 15, 2018 1:16 PM

To: Granger, Michelle

Cc: Bruce S Kennington

Subject: Re: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Thanks for the update Michelle.

We can be generally available Tue (before 10:30 am est or after 12 pm est) or Wed next week for a call with USEPA.

Luis Hidalgo

Sent from my iPad

On Aug 15, 2018, at 7:47 AM, Granger, Michelle <Granger.Michelle@epa.gov> wrote:

Hi, Luis-

This week is not looking good for the call. I'm looking into next Tues. or Wed. morning. Please let me know your availability. I'm checking with my team as well.

Thank you!

Michelle-

From: Hidalgo, Luis (G&I) [<mailto:Luis.Hidalgo@riotinto.com>]

Sent: Tuesday, August 14, 2018 4:28 PM

To: Granger, Michelle <Granger.Michelle@epa.gov>

Cc: Bruce S Kennington <bkennington@ramboll.com>

Subject: Re: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Michelle,

Clarifying for Thu options: a call on Thu before 10:30 AM ET or after 2:00 PM ET would work for us.

Thanks,

Luis Hidalgo

Sent from my iPad

On Aug 14, 2018, at 2:21 PM, Hidalgo, Luis (G&I) <Luis.Hidalgo@riotinto.com> wrote:

Yes. Thu should work.

Thanks,

Luis Hidalgo

Sent from my iPhone

On Aug 14, 2018, at 2:18 PM, Granger, Michelle <Granger.Michelle@epa.gov> wrote:

Hi, Luis-

Thank you for your patience. I'm checking on availability for tomorrow morning and Thursday with the USACE. If tomorrow doesn't work out, does Thursday work for you?

Best,

Michelle-

From: Hidalgo, Luis (G&I)

[<mailto:Luis.Hidalgo@riotinto.com>]

Sent: Tuesday, August 14, 2018 4:07 PM

To: Granger, Michelle <Granger.Michelle@epa.gov>

Cc: Bruce S Kennington <bkennington@ramboll.com>

Subject: Fwd: Pohatcong OU3 - PDI Next Steps Proposal presented on the 7/2/18 call

Michelle, looking forward to a confirmation time for the meeting. Alternatively, please let us know if another day is preferred by you and your team.

Luis Hidalgo

Sent from my iPhone

From: "Granger, Michelle"

<Granger.Michelle@epa.gov>

Date: August 13, 2018 at
12:08:49 PM CDT

To: Bruce Kennington
<bkennington@ramboll.com>

**Subject: Fw: Pohatcong OU3 -
PDI Next Steps Proposal
presented on the 7/2/18 call**

Hi, Bruce-
I'll check availability for Wed.
with USACE. I'll keep you
posted. If anything has changed
and you are thinking of a
different day, please let me
know.
Thank you!
Michelle-

From: Hidalgo, Luis (G&I)
<Luis.Hidalgo@riotinto.com>
Sent: Thursday, August 9, 2018
4:17 PM
To: Granger, Michelle
Cc: Bruce Kennington; Oconnell,
Kimberly; Zizila, Frances
Subject: RE: Pohatcong OU3 -
PDI Next Steps Proposal
presented on the 7/2/18 call
Dear Michelle,
Thanks for EPA's feedback and
comments.
We're proposing to have a
conference call next
Wednesday (Aug 15) to discuss
the feasibility of additional
boreholes prior to the
December shutdown, as well as
technical limitations of such
equipment and design timeline
commitment. We'll have
responses to your email below
to be discussed during the call.
Bruce will schedule the call, at a
time that suits you and your
team.
Regards,
Luis Hidalgo
Project Manager, Principal
Advisor

Rio Tinto

4700 Daybreak Parkway, South Jordan,
UT 84009

T: +1 801 569 6412 M: +1 435 932
3965

luis.hidalgo@riotinto.com

<http://www.riotinto.com/>

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Rio Tinto Services Inc. Registered office 2711
Centerville Road, Suite 400, Wilmington,
Delaware 19808 USA.

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recipient, please notify us immediately and
delete this message from your system without
first printing or copying it. Any personal data in
this email (including any attachments) must be
handled in accordance with the Rio Tinto
Group Data Protection Policy and all applicable
data protection laws.

From: Granger, Michelle

<Granger.Michelle@epa.gov>

Sent: Thursday, August 9, 2018
11:06 AM

To: Hidalgo, Luis (G&I)

<Luis.Hidalgo@riotinto.com>

Cc: Bruce Kennington

<bkennington@ramboll.com>;

Oconnell, Kimberly

<OConnell.Kim@epa.gov>;

Zizila, Frances

<Zizila.Frances@epa.gov>

Subject: Pohatcong OU3 - PDI
Next Steps Proposal presented
on the 7/2/18 call

Dear Luis,
EPA has reviewed the PDI
next steps slides and
proposal discussed on our
technical call on 7/2/18.
EPA has two issues with
the PDI proposal presented
on the call:

1. **Scope of the PDI** -
EPA believes further

delineation to the north of PDI-SB25 and to the south of PDI-SB26 is still necessary. Both PDI-SB25 and 26 were installed within the hallway parallel to the molding room, outside the manufacturing area. Our understanding is that installation of those borings did not require shutdown. For that reason, we would like to know whether two additional borings (see figure attached) can be installed to the north and south of PDI-SB25 and 26, respectively, now while the Albea plant is in operation? These two additional borings are needed in addition to the proposed borings within the manufacturing area to determine the extent of contamination and treatment area.

2. Schedule of the Project

-

The OU3 Preliminary Design Report (30% design) is scheduled to be submitted in September 2018. Under paragraph 12 of the Consent Decree and Section VI.C.4, the 30% RD report is to contain the results of the PDI sampling. EPA had expected that all of the results of the PDI would be included in the 30% RD report.

During our technical call with PPPI/Rio Tinto on Monday, July 2nd, EPA was informed that additional sampling needed for the PDI in the manufacturing area adjacent to the molding room is not scheduled for another 5 months until the end of December 2018 when the Albea plant will be shut down for a period of time. Absent additional information from PPPI/Rio Tinto documenting their efforts to secure an earlier date for this sampling from Albea as well as the reasons that an earlier date is not possible, EPA does not consider the December sampling date to be reasonable. The two additional borings mentioned in item #1, the ones north and south of PDI-25 and PDI-26 could be done now, while the plant

is in operation;
therefore, EPA does not
see a reason for delaying
those two borings. In
addition, in an effort to
complete the proposed
borings sooner, PPPI/Rio
Tinto should consider
other options, including
using two rigs to obtain
the soil borings in a
shorter period of time
which would reduce the
impact to Albea's
operations. Obtaining the
results of the soil
borings sooner than
December 2018 will enable
those results to be
presented in the 90%
Design Report to be
submitted to EPA in
January 2019 and will
build in extra time in
case those results require
stepping out for
additional sampling. It is
very important to EPA that
the final RD report is
completed by February 28,
2019 so that this project
remains on schedule.
Please feel free to
contact me if you have any
questions.
Sincerely,
Michelle Granger, EPA RPM
212-637-4975

<image001.gif>